

Exhibit 1 -  
January 14, 2021 Email from Chris Cotten

## Mathew Jehl

---

**From:** Cotten, Chris (USATNW) <Chris.Cotten@usdoj.gov>  
**Sent:** Thursday, January 14, 2021 12:34 PM  
**To:** Larry Laurenzi  
**Cc:** Mathew Jehl  
**Subject:** RE: Discovery Request

Larry,

None of the documents provided in discovery are currently Bates stamped. Since the advent of quick electronic Bates stamping, I typically hold off on doing it until closer to trial when I have a better idea of which documents I'm actually going to use. When Bates stamping does occur, I will provide you with copies of those versions.

With regard to the accountant, we have not made a final decision as to whether to use her as a witness at trial, and if so, whether to notice her as an expert witness. If she is to be an expert witness, the government is aware of its responsibilities under Rule 16(a)(1)(G) and will timely provide the required information. With that said, I remain open to the idea which you broached previously of meeting on a more informal basis to discuss the proof with an eye toward possibly reaching a resolution. Either way, I don't believe that this is an issue that will need to be resolved in a motion.

Feel free to give me a call if you would like to discuss further.

Chris

Christopher E. Cotten  
Assistant U.S. Attorney  
Western District of Tennessee  
800 Federal Bldg., 167 N. Main  
Memphis, TN 38103  
(901) 969-2940 (desk)  
(901) 210-4837 (cell)

---

**From:** Larry Laurenzi <l Laurenzi@BPJLAW.COM>  
**Sent:** Wednesday, January 13, 2021 12:57 PM  
**To:** Cotten, Chris (USATNW) <CCotten@usa.doj.gov>  
**Cc:** Mathew Jehl <mjehl@BPJLAW.COM>  
**Subject:** Discovery Request

Dear Chris – in wading through the discovery material can you tell me if any of the documents provided in discovery have been bates stamped and if so, will you provide us with the bates stamped copies. I am concerned that the lack of document control will present a problem if this case goes to trial.

Secondly, we discussed briefly your intent to use an accountant at trial. We are asking the government to provide us with a copy of this person's work papers including any conclusions and/or findings that person reached. It is our intent to file a motion for the discovery of the materials absent an agreement to provide us with the materials. Please let us know the answers to these two questions.

Thank you and I hope you are doing well.

Larry



**Lawrence J. Laurenzi**

**Burch, Porter & Johnson, PLLC**

130 North Court Avenue | Memphis, TN 38103

Direct: 901-524-5156 | Main: 901-524-5000

[llaurenzi@bpjlaw.com](mailto:llaurenzi@bpjlaw.com) | [Bio](#) | [vcard](#)

This message is being sent by or on behalf of a lawyer. It is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged or confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by e-mail and delete all copies of the message.